

Plf.'s Interrogatory No. 15 to Espanola Defs.: Please provide a full and detailed description of any disciplinary action that has been taken, or any grievance or complaint that has been lodged, against you in your capacity as a law enforcement officer, whether you were employed by the City of Espanola or elsewhere.

ANSWER:

Approximately 9/2010 I received a verbal counseling for not attending a Grand Jury Hearing.

Approximately 11/2012 I received a written counseling when a senior office accused me of excessive force when I assisted an officer in training that was struggling to take a subject into custody. I only assisted when I observed the training officer making no attempt to assist the officer in training.

Both of these actions have been dropped from my personal file.